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15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 X Corp.,

18 Plaintiff,

19 Case No. 23-cv-03698-WHA

20 v.

21 BRIGHT DATA LTD.,  
22 Hon. William H. Alsup  
23 Courtroom 12 – 19<sup>th</sup> Floor  
24 July 25, 2024 at 8 a.m.

25 Defendant.

26 **BRIGHT DATA'S NOTICE OF ERRATA TO**  
27 **ITS MOTION TO DISQUALIFY QUINN EMANUEL**

28 Undersigned Counsel for Bright Data apologizes for the errors in Bright Data's Motion to Disqualify Quinn Emanuel ("Disqualification Motion"). Pursuant to this Court's Order (ECF 94), Bright Data submits the accompanying Errata for the Motion (Ex. 1), as well as a corrected Motion (Ex. 2), and a redline of the original Disqualification Motion versus the corrected Motion (Ex. 3).

The changes to Disqualification Motion are as follows:

<i>Page:Line<sup>1</sup></i>	<i>Original Text</i>	<i>Corrected Text.</i>
i:9	<i>Meta Platforms, Inc. v. Bright Data Ltd.</i> , 23-cv-00077 (N.D. Cal.)	<i>Meta Platforms, LLC v. Bright Data Ltd.</i> , 23-cv-00077 (N.D. Cal.)
iv:11	Omission	<i>hiQ Labs, Inc. v. LinkedIn Corp.</i> , 639 F.Supp.3d 944 (N.D. Cal. 2022)
v:26	Hazard, et al., <i>The Law of Lawyering</i> (4 <sup>th</sup> ed. 2023)	Hazard, et al., <i>The Law of Lawyering</i> (4 <sup>th</sup> ed. 2023)
1:11	“free reign to decide ...	“free rein to decide ...
4:11	639 F.Supp.2d 944 (N.D. Cal. 2022).	639 F.Supp.3d 944 (N.D. Cal. 2022).
4:27	... which it discussed with Bright Data’s general counsel telephonically on or about February 26, 2023.	... which it discussed with Bright Data’s general counsel over video conference on or about February 26, 2023.
5:6	... it “approached the analysis’ ...	... it “approached the analysis’ ...
6:28	Quinn entered its appearance on June 4, 2023.	Quinn entered its appearance on June 4, 2024.
7:1	Just two days later, on June 6, 2022,	Just two days later, on June 6, 2024,
	...	...
12:14	... does not require an exact match between facts and issues in the two cases. <sup>2</sup> ).	... does not require an exact match between facts and issues in the two” cases.).
12:24	(“The words ‘subject’ ...	(“The words ‘subject’ ...
12:27	In the <i>HiQ</i> case, ...	In the <i>hiQ</i> case, ...
13:10	... it casts doubt of the reliability ...	... it casts doubt on the reliability ...
14:15	... and analyses of its claims, ...	... analyses of its claims, ...
15:20-21	(“Where the requisite substantial relationship can be demonstrated, access to confidential information in the first representation (relevant, by definition, to the second representation) is presumed and disqualification is mandatory”);	(“Where the requisite substantial relationship can be demonstrated, access to confidential information in the ... first representation (relevant, by definition, to the second representation) is presumed and disqualification is mandatory”);
16:3	Moreover, the circumstances surrounding the Quinn’s engagement ...	Moreover, the circumstances surrounding Quinn’s engagement ...
19:2	<i>cf. Openwave Sys. Inc. v. Myriad France S.A.S.</i> , 2011 WL 1225978, *4 (N.D. Cal. 2011)	<i>cf. Openwave Sys. Inc. v. Myriad France S.A.S.</i> , 2011 WL 1225978, *5 (N.D. Cal. 2011)
19:3	<i>Kirk v. First Am. Ins. Co.</i> , 183 Cal.App.4th 776, 108 (2010)	<i>Kirk v. First Am. Ins. Co.</i> , 183 Cal.App.4th 776, 814 (2010) (same).

<sup>1</sup> References to page and line numbers are to the original Disqualification Motion.

<i>Page:Line<sup>1</sup></i>	<i>Original Text</i>	<i>Corrected Text.</i>
1	(same).	
2		
19:27	... <b>Second Circuit ...</b>	... <b>Second Circuit ...</b>
3		
20:19	<i>SpeeDee</i> , 20 Cal. 4th at 1145 (same).	<i>SpeeDee</i> , 20 Cal. 4th at 1145 <b>n.2</b> (same).
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1 Dated: June 12, 2024

Respectfully submitted,

2 /s/ Colin R. Kass

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